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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

LINCOLN ADVENTURES, LLC, a)	No. 2:08-cv-00235-CCC-JSA
Delaware Limited Liability Company,)	
and MICHIGAN MULTI-KING, INC.,)	<u>CLASS ACTION</u>
a Michigan Corporation, on Behalf of)	
Themselves and All Those Similarly)	NOTICE OF MOTION FOR
Situated,)	PRELIMINARY APPROVAL OF
)	PARTIAL CLASS ACTION
Plaintiffs,)	SETTLEMENT
)	
vs.)	Motion Return Date: May 19, 2025
)	
THOSE CERTAIN UNDERWRITERS)	
AT LLOYD'S, LONDON MEMBERS)	
OF SYNDICATES, et al.)	
)	
Defendants.)	
_____)	

TO: ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on May 19, 2025, Plaintiffs, by and through their counsel, shall move before the Honorable Claire C. Cecchi, U.S.D.J. at the United States District Court for the District of New Jersey, in Courtroom 5B located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order preliminarily approving the proposed Stipulation of Partial Class Action Settlement (the “Agreement”).¹

By this motion, Plaintiffs respectfully move the Court for an Order:

1. Preliminarily approving the partial settlement set forth in the Agreement (the “Partial Settlement”);²
2. Approving the proposed forms of notice and the notice plan, and directing that notices be disseminated pursuant to this plan; and
3. Setting a Fairness Hearing and certain other dates in connection with the final approval of the Partial Settlement.

In support thereof, Plaintiffs rely on the accompanying: (1) Memorandum of Law in Support of Plaintiffs’ Motion for Preliminary Approval of Partial Class Action Settlement; (2) the Bernay Declaration and exhibits thereto; (3) the

¹ A copy of the executed Agreement is attached as Exhibit A to the accompanying Declaration of Alexandra S. Bernay (the “Bernay Declaration”).

² The Settling Defendants are Lloyd’s Syndicates 727, 2791, 1003, 2003 and 2020.

Agreement; (4) the Declaration of Robert S. Schachter and exhibit thereto; (5) the Declaration of Mark Cowen; (6) all other pleadings and matters of record; and (7) such additional evidence or argument as may be presented before or at the hearing.

DATED: April 17, 2025

Respectfully submitted,

COHN LIFLAND PEARLMAN
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s/ Matthew F. Gately
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